

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND LTD., FRONTPOINT EUROPEAN FUND, L.P., FRONTPOINT FINANCIAL SERVICES FUND, L.P., FRONTPOINT HEALTHCARE FLAGSHIP ENHANCED FUND, L.P., FRONTPOINT HEALTHCARE FLAGSHIP FUND, L.P., FRONTPOINT HEALTHCARE HORIZONS FUND, L.P., FRONTPOINT FINANCIAL HORIZONS FUND, L.P., FRONTPOINT UTILITY AND ENERGY FUND L.P., HUNTER GLOBAL INVESTORS FUND I, L.P., HUNTER GLOBAL INVESTORS FUND II, L.P., HUNTER GLOBAL INVESTORS OFFSHORE FUND LTD., HUNTER GLOBAL INVESTORS OFFSHORE FUND II LTD., HUNTER GLOBAL INVESTORS SRI FUND LTD., HG HOLDING LTD., HG HOLDING II LTD., and FRANK DIVITTO, on behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

CREDIT SUISSE GROUP AG, CREDIT SUISSE AG, JPMORGAN CHASE & CO., THE ROYAL BANK OF SCOTLAND PLC, UBS AG, BLUECREST CAPITAL MANAGEMENT LLP, DEUTSCHE BANK AG, DB GROUP SERVICES UK LIMITED, and JOHN DOES NOS. 1-50,

Defendants.

No. 15-cv-00871 (SHS)

**DECLARATION OF JOANNE BAGSHAW
IN SUPPORT OF DB GROUP SERVICES (UK) LIMITED'S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION**

I, Joanne Bagshaw, hereby declare:

1. I am Corporate Secretary of DB Group Services (UK) Limited (“DB Group Services”). I submit this declaration in further support of DB Group Services’ motion to dismiss the above-captioned action for lack of personal jurisdiction. The facts stated herein are true based on my own personal knowledge, inquiries within DB Group Services and my review of records maintained in the regular course of business by DB Group Services.

2. DB Group Services is an indirectly held subsidiary of Deutsche Bank Aktiengesellschaft (“Deutsche Bank AG”) incorporated under the laws of the United Kingdom.

3. DB Group Services’ headquarters are located at 23 Great Winchester Street, London, United Kingdom, EC2P 2AX. DB Group Services’ sole place of business is and has always been in the United Kingdom.

4. DB Group Services is a services company. DB Group Services’ principal business is to supply the services of its employees to Deutsche Bank AG and its subsidiaries in the United Kingdom. As a services company, DB Group Services does not provide banking services or engage in the trading of financial instruments.

5. At all relevant times, DB Group Services was not a member of the panel of banks that submitted or contributed to the British Bankers’ Association’s Swiss Franc London Interbank Offered Rate (“LIBOR”).

6. At all relevant times, DB Group Services did not have any operations in the United States.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 14th day of August 2015 in London, United Kingdom.



Joanne Bagshaw